

**Congress of the United States**  
**Washington, DC 20515**

**0172**

February 7, 2011

Commissioners  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Dear Chairman Genachowski, Commissioner Baker, Commissioner Clyburn,  
Commissioner Copps, and Commissioner McDowell:

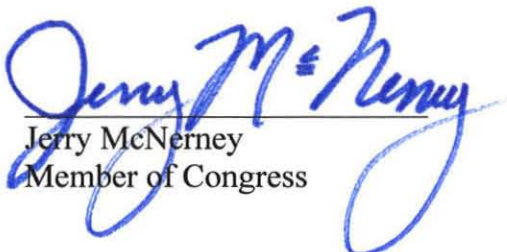
As you know, providers of video relay services (VRS) fill a crucial role facilitating telephone communications for deaf, hard-of-hearing, and speech-impaired individuals. Several companies provide the necessary technology and interpreters to allow everyone to be able to communicate, and it is important that each of these companies adhere to basic guidelines to ensure competent service. I am happy that the Federal Communications Commission has created a certification process to make sure that VRS companies are able to provide quality service to customers.

However, Convo Communications, a company with employees and consumers in our districts, applied for certification from the Commission in October 2009, but its application has still not been processed. The FCC has informed us that the certification process has come under scrutiny following the discovery that several unscrupulous companies were improperly taking advantage of the system, and we appreciate your commitment to protecting consumers. However, we are concerned about the length of time that Convo's application has been pending.

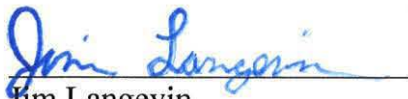
We urge you to process Convo Communications' application in a fair and timely manner. Delaying certification hinders the company's ability to efficiently run a business, and certification delays for good companies ultimately prove detrimental to customers who depend on VRS.

The FCC has played a significant role supporting Americans with disabilities. We request that you inform us of the progress of Convo Communications' application at the earliest opportunity.

Sincerely,

  
Jerry McNerney  
Member of Congress

  
Jo Bonner  
Member of Congress



Jim Langevin  
Member of Congress



Jim McDermott  
Member of Congress



Tom McClintock  
Member of Congress

Cc: Gregory Hlibok, Chief, Disability Rights Office  
Joel Gurin, Chief, Consumer and Governmental Affairs Bureau



FEDERAL COMMUNICATIONS COMMISSION

August 19, 2011

JULIUS GENACHOWSKI  
CHAIRMAN

The Honorable Jo Bonner  
U.S. House of Representatives  
2236 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Bonner:

Thank you for your letter supporting the application for certification filed by Convo Communications. I appreciate your support for the video relay service (VRS), which has become a critical communications tool for many Americans who are deaf or hard of hearing.

The Commission has been reviewing the VRS program to ensure that the provision of VRS is fair, efficient, and sustainable, and to consider mechanisms for combating waste, fraud, and abuse. This review included an examination of the Commission's certification program for VRS and other Internet-based telecommunications relay service (iTRS) providers. On July 28, 2011, the Commission released an *Order* adopting a revised certification process for these providers. The *Order* establishes clear criteria for granting certification to qualifying entities, and adopts measures that will enable the Commission to exercise the oversight needed to ensure full compliance with the TRS rules. One new provision requires all iTRS providers to obtain certification from the Commission in order to be eligible to receive compensation from the TRS Fund.

Convo currently is providing service under a revenue sharing arrangement with a certified provider. Under that arrangement, Convo provides VRS and then receives compensation for those services from the certified entity, which in turn gets paid for VRS from the Fund. The Commission has directed such arrangements to cease by October 1, 2011, because some of these types of arrangements have been associated with fraud and abuse of the VRS program. However, Convo may be able to continue providing VRS if it files an amended certification application as soon as possible after the rules adopted in the new certification *Order* become effective. In a May 18, 2011 filing, Convo indicated its intention to submit such an amendment to its certification application. Once submitted, the Commission's staff will review Convo's amended application as expeditiously as possible.

The Commission is dedicated to fulfilling the vision of Congress for a nationwide TRS that is available to all Americans in the most efficient manner. I appreciate your interest in this very important matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julius Genachowski", is written over a horizontal line. The signature is stylized and fluid.

Julius Genachowski



FEDERAL COMMUNICATIONS COMMISSION

August 19, 2011

JULIUS GENACHOWSKI  
CHAIRMAN

The Honorable Jim Langevin  
U.S. House of Representatives  
109 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Langevin:

Thank you for your letter supporting the application for certification filed by Convo Communications. I appreciate your support for the video relay service (VRS), which has become a critical communications tool for many Americans who are deaf or hard of hearing.

The Commission has been reviewing the VRS program to ensure that the provision of VRS is fair, efficient, and sustainable, and to consider mechanisms for combating waste, fraud, and abuse. This review included an examination of the Commission's certification program for VRS and other Internet-based telecommunications relay service (iTRS) providers. On July 28, 2011, the Commission released an *Order* adopting a revised certification process for these providers. The *Order* establishes clear criteria for granting certification to qualifying entities, and adopts measures that will enable the Commission to exercise the oversight needed to ensure full compliance with the TRS rules. One new provision requires all iTRS providers to obtain certification from the Commission in order to be eligible to receive compensation from the TRS Fund.

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FEDERAL COMMUNICATIONS COMMISSION

August 19, 2011

JULIUS GENACHOWSKI  
CHAIRMAN

The Honorable Tom McClintock  
U.S. House of Representatives  
428 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman McClintock:

Thank you for your letter supporting the application for certification filed by Convo Communications. I appreciate your support for the video relay service (VRS), which has become a critical communications tool for many Americans who are deaf or hard of hearing.

The Commission has been reviewing the VRS program to ensure that the provision of VRS is fair, efficient, and sustainable, and to consider mechanisms for combating waste, fraud, and abuse. This review included an examination of the Commission's certification program for VRS and other Internet-based telecommunications relay service (iTRS) providers. On July 28, 2011, the Commission released an *Order* adopting a revised certification process for these providers. The *Order* establishes clear criteria for granting certification to qualifying entities, and adopts measures that will enable the Commission to exercise the oversight needed to ensure full compliance with the TRS rules. One new provision requires all iTRS providers to obtain certification from the Commission in order to be eligible to receive compensation from the TRS Fund.

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FEDERAL COMMUNICATIONS COMMISSION

August 19, 2011

JULIUS GENACHOWSKI  
CHAIRMAN

The Honorable Jim McDermott  
U.S. House of Representatives  
1035 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman McDermott:

Thank you for your letter supporting the application for certification filed by Convo Communications. I appreciate your support for the video relay service (VRS), which has become a critical communications tool for many Americans who are deaf or hard of hearing.

The Commission has been reviewing the VRS program to ensure that the provision of VRS is fair, efficient, and sustainable, and to consider mechanisms for combating waste, fraud, and abuse. This review included an examination of the Commission's certification program for VRS and other Internet-based telecommunications relay service (iTRS) providers. On July 28, 2011, the Commission released an *Order* adopting a revised certification process for these providers. The *Order* establishes clear criteria for granting certification to qualifying entities, and adopts measures that will enable the Commission to exercise the oversight needed to ensure full compliance with the TRS rules. One new provision requires all iTRS providers to obtain certification from the Commission in order to be eligible to receive compensation from the TRS Fund.

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Sincerely,

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Julius Genachowski



FEDERAL COMMUNICATIONS COMMISSION

August 19, 2011

JULIUS GENACHOWSKI  
CHAIRMAN

The Honorable Gerald "Jerry" M. McNerney  
U.S. House of Representatives  
1210 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letter supporting the application for certification filed by Convo Communications. I appreciate your support for the video relay service (VRS), which has become a critical communications tool for many Americans who are deaf or hard of hearing.

The Commission has been reviewing the VRS program to ensure that the provision of VRS is fair, efficient, and sustainable, and to consider mechanisms for combating waste, fraud, and abuse. This review included an examination of the Commission's certification program for VRS and other Internet-based telecommunications relay service (iTRS) providers. On July 28, 2011, the Commission released an *Order* adopting a revised certification process for these providers. The *Order* establishes clear criteria for granting certification to qualifying entities, and adopts measures that will enable the Commission to exercise the oversight needed to ensure full compliance with the TRS rules. One new provision requires all iTRS providers to obtain certification from the Commission in order to be eligible to receive compensation from the TRS Fund.

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